



State of Ohio Environmental Protection Agency

Northeast District Office

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US EPA RECORDS CENTER REGION 5



526395

George V. Voinovich
Governor

September 17, 1996

RE: HUKILL CHEMICAL CORPORATION
OHD 001 926 740/#02-18-0315
CUYAHOGA

CERTIFIED MAIL

Mr. Robert Hukill
President
Hukill Chemical Corporation
7013 Krick Road
Bedford, Ohio 44146

Dear Mr. Hukill:

On August 26 and 27, 1996, the Ohio Environmental Protection Agency (EPA) Division of Hazardous Waste Management (DHWM) and the United States Environmental Protection Agency (U.S. EPA) conducted a compliance evaluation inspection of the Hukill Chemical Corporation (HCC) located at 7013 Krick Road, Bedford, Ohio. The purpose of the inspection was to evaluate the facility for compliance with state and federal hazardous waste regulations, and for U.S. EPA to evaluate HCC's compliance with the Subpart AA and BB organic air emission standards. The Ohio EPA was represented by this writer and U.S. EPA was represented by Gertrude Matuschkovitz. HCC was represented by Mike Mraz and Ed Price. I have enclosed copies of the inspection checklists for your records.

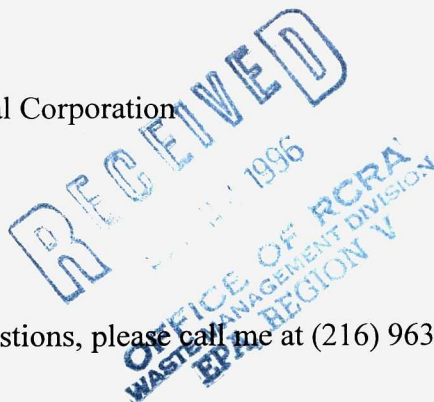
No violations were noted at the time of this inspection. There was, however, a problem with a load of non-hazardous waste water which was shipped to Chemical Solvents for disposal. The material was ultimately rejected by Chemical Solvents because it had a flashpoint less than 140 F. The rejected material was shipped back to HCC. The waste water was re-analyzed by HCC and determined to have a flashpoint of greater than 200 F when using HCC's equipment. An independent lab was given a sample of the material and their analytical results indicated that the material was a hazardous waste with a flashpoint of less than 140 F.

Within fifteen (15) days of receipt of this letter please provide information regarding the ultimate disposal of the material in question. Also please provide a detailed narrative explaining why HCC's set-a-flash is not working properly and how it will either be repaired or replaced.

Failure to list specific deficiencies that may have been overlooked in this communication does not release HCC from compliance with all applicable hazardous waste regulations. Please be advised that past or future instances of non-compliance can continue as subjects of pending or future enforcement actions.



Mr. Robert Hukill - Hukill Chemical Corporation
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Should you have any additional questions, please call me at (216) 963-1162.

Sincerely,

Marlene M. Emanuelson
Environmental Scientist
Division of Hazardous Waste
Management

MME/fwn

cc Frank Popotnik, DHWM, NEDO
Linda Neumann, DHWM, CAS, CO
Mike Mraz, Plant Manager, HCC
Gertrude Matuschkovitz, U.S. EPA, Region V